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14 *Attorneys for Defendant*
15 *Walmart Inc.*

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 MARIA DOLORES MORALES BECERRA,
19 an individual, CLARISSA BECERRA, an
20 individual, RAYNA BECERRA, an individual
21 and RICHARD BECERRA, IN HIS
22 CAPACITY AS SPECIAL ADMINISTRATOR
23 FOR THE ESTATE OF RAYMOND
24 BECERRA, DECEASED,

25 Plaintiffs,

26 vs.

27 WALMART INC., a foreign business entity
28 d/b/a WALMART, DOE INDIVIDUALS 1-10;
ROE ENTITIES I-X, inclusive

Defendant(s).

Case No.: 2:21-cv-02094-JCM-NJK

ORDER TO EXTEND DISCOVERY
DEADLINES

[FIRST REQUEST]

29 Plaintiff MARIA DOLORES MORALES BECERRA, CLARISSA BECERRA, RAYNA
30 BECERRA, and RICHARD BECERRA, IN HIS CAPACITY AS SPECIAL ADMINISTRATOR
31 FOR THE STATE OF RAYMOND BECERRA (hereinafter “Plaintiffs”) and Defendant WALMART
32 INC. d/b/a WALMART (hereinafter “Defendant” or “Walmart”), by and through their respective
33 counsel of record, do hereby stipulate to extend the remaining deadlines in the current scheduling order
34 and discovery plan in this matter for a period of sixty (60) days for the reasons explained herein.

1 Pursuant to Local Rule 6-1(b), the parties hereby aver that this is the first such discovery
2 extension requested in this matter.

3 **DISCOVERY COMPLETED TO DATE**

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- The parties have conducted an FRCP 26(f) conference and have served their respective FRCP
26(a) disclosures;
- The parties have filed all required documents pursuant to ECF 2 to date;
- Plaintiff has provided provider specific authorizations;

9 **DISCOVERY TO BE COMPLETED AND REASONS FOR EXTENSION OF DISCOVERY**

10 Discovery to be completed includes:

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- Defendant written discovery to Plaintiff;
- Plaintiff written discovery to Defendant;
- Deposition of Plaintiff;
- Depositions of Plaintiff's treating physicians;
- Depositions of fact witnesses;
- Disclosure of experts by both parties;
- Depositions of expert witnesses and rebuttal expert witnesses; and
- Plaintiff to notice Defendant's 30(b)(6) deposition.

18 The parties aver, pursuant to Local Rule 6-1, that good cause exists for the requested extension.

19 The parties agree that, pending this Court's approval, extension of remaining discovery deadlines is
20 appropriate, as Defendant has been awaiting Raymond Becerra executed medical authorizations. As
21 Raymond Becerra is deceased and said records are vital in this lawsuit. Defendant has recently received
22 the requested executed medical authorizations, and Defendant is in the process of subpoenaing said
23 records so this matter can be determined on the merit. As the deadline for expert disclosures is
24 approaching, the parties have agreed to a 60-day discovery extension in order to ensure that meaningful
25 discovery is conducted.

26 The parties have acted in good faith to request this extension and have no intent, nor reason, to
27 delay the resolution of this matter.

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1 **[PROPOSED] NEW DISCOVERY DEADLINES**

2 **Last Day to Amend Pleadings or Add Parties:**

3 Currently: February 15, 2022

4 Proposed: **April 18, 2022**

5 **Expert Disclosure Deadline:**

6 Currently: March 17, 2022

7 Proposed: **May 16, 2022**

8 **Rebuttal Expert Disclosure Deadline:**

9 Currently: April 17, 2022

10 Proposed: **June 16, 2022**

11 **Discovery Cut-Off Date:**

12 Currently: May 16, 2022

13 Proposed: **July 15, 2022**

14 **Dispositive Motion Deadline:**

15 Currently: June 15, 2022

16 Proposed: **August 15, 2022**

17 **Proposed Joint Pre-Trial Deadline:**

18 Currently: July 15, 2022

19 Proposed: **September 13, 2022**

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1 If this extension is granted, all anticipated additional discovery should be concluded within the
2 stipulated extended deadline. The parties aver that this request for extension of discovery deadlines is
3 made by the parties in good faith and not for the purpose of delay.
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5 DATED this 7th day of February, 2022.

6 **ROYAL & MILES LLP**

7 _____
8 /s/ Gregory A. Miles
9 GREGORY A. MILES, ESQ.
10 Nevada Bar No. 4336
11 MICHAEL A. ROYAL, ESQ.
12 Nevada Bar No. 4370
13 1522 W. Warm Springs Rd.
14 Las Vegas, Nevada 89014

15
16 *Attorneys for Plaintiff*

5 DATED this 7th day of February, 2022.

6 **PHILLIPS, SPALLAS & ANGSTADT LLC**

7 _____
8 /s/Latisha Robinson
9 ROBERT K. PHILLIPS, ESQ.
10 Nevada Bar No. 1144
11 TIMOTHY D. KUHLS, ESQ.
12 Nevada Bar No. 13362
13 LATISHA ROBINSON, ESQ.
14 Nevada Bar No. 15314
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16 Las Vegas, NV 89101

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18 *Attorneys for Defendant*
19 *Walmart Inc.*

20 **IT IS SO ORDERED:**

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23 **UNITED STATES MAGISTRATE JUDGE**

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25 **DATED: February 8, 2022**

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